



7852 Walker Drive, Suite 200. Greenbelt, MD 20770

phone: 301-459-7590, fax: 301-577-5575

internet: www.jsitel.com, e-mail: jsi@jsitel.com

February 3, 2006

BY HAND DELIVERY

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary c/o Natek, Inc., Inc. 236 Massachusetts Avenue, N.E. Suite 110 Washington, DC 20002

RECEIVED

FEB - 3 2006

Federal Communications Commission Office of Secretary

Re: Certification of CPNI

EB Docket No. 06-36 EB-06-TC-060

CPNI Compliance Certification for

East Ascension Telephone Company, LLC 499 Filer ID No. 808173 Advanced Tel, Inc. and TLX Communications, Inc. 499 Filer ID No. 822106

Dear Ms. Dortch:

On behalf of the telecommunications carriers listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

Scott Duncan

JSI Staff Director-Regulatory Affairs

Dut Duncon

sduncan@jsitel.com

Attachment

Copies: 4 additional copies to Secretary

Byron McCoy, Telecommunications Consumers Division

Best Copy and Printing (BCPI)

No. of Coolee reold () Y 4

AFFIDAVIT OF EAST ASCENSION TELEPHONE COMPANY, LLC FCC ID 808173 ADVANCED TEL, INC. AND TLX COMMUNICATIONS, INC. FCC ID 822106

I am the President and Chief Operating Officer of East Ascension Telephone Co., LLC, Advanced Tel, Inc. and TLX Communications, Inc.. I hereby certify that I have personal knowledge that East Ascension Telephone Co., LLC, Advanced Tel, Inc. and TLX Communications, Inc. are in compliance with the Federal Communications Commission ("FCC") rules respecting customer proprietary network information ("CPNI") contained in Part 64, Subpart U of the FCC's rules. Accompanying this certificate is a statement explaining how East Ascension Telephone Co., LLC, Advanced Tel, Inc. and TLX Communications, Inc. are in compliance with the FCC's CPNI rules. I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with FCC rules.

Name: Robert L. BURGESS

Title: PRESIDENT & COO

Date: 7 direct C, 2006

Attachment

⁴⁷ C.F.R. §§ 64.2001-2009.

EAST ASCENSION TELEPHONE CO., LLC, ADVANCED TEL, INC. AND TLX COMMUNICATIONS, INC.

STATEMENT OF FCC CPNI RULE COMPLIANCE

This statement serves to explain how the East Ascension Telephone Co., LLC, Advanced Tel, Inc. and TLX Communications, Inc. ("EATEL") are complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC's rules is called "customer proprietary network information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R. §§ 64.2000-2009).

1. Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC's rules at Part 64, Subpart U, Section 64.2003(d) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1).

2. Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

3. Identification of Permissible Uses of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI <u>not</u> requiring customer authorization under the FCC's Part 64, Subpart U, Section 64.2005.

4. Identification of Uses of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC's rules at Part 64, Subpart U, Section 64.2007.

5. Customer Notification and Authorization Process

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied

with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

6. Training

The Company has trained existing employees having access to, or occasion to use CPNI, as to when they are and are not authorized to use CPNI. For new employees having access to, or occasion to use CPNI, the Company will include such training as part of employee orientation and training.

7. Record of Customer CPNI Approval/Non-Approval

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

8. Disciplinary Process

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

9. Supervisory Review Process for Outbound Marketing

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.